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10 Attorneys for Plaintiffs
11 DWIGHT WATSON, DANIEL FARIAS,
LAUREN WATSON, and NICOLE WATSON

E-FILED - 3/13/08

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION
16

17 DWIGHT WATSON, DANIEL FARIAS,
18 LAUREN WATSON, and NICOLE WATSON,

19 Plaintiffs,

20 v.

21 GLENN ALBIN, DAVID MENDEZ, FRANK
22 ST. CLAIR, MIKE D' ANTONIO, MIKE
RUBINO, SANTA CLARA COUNTY, STATE
23 OF CALIFORNIA , and DOES
1-50,

24 Defendants.

Case No. C06-07767 RMW (HRL)

**[XXXXXXXXXXXXX] ORDER AND
STIPULATION EXTENDING
DEADLINES TO PRODUCE
CERTAIN DISCOVERY AND
FILE MOTIONS TO COMPEL
RELATED TO CERTAIN
DISCOVERY**

25
26 Under Civil Local Rules 6-2 and 7-12, Plaintiffs Dwight Watson, Daniel Farias, Lauren
27 Watson, and Nicole Watson (collectively, "Plaintiffs") and defendants Glenn Albin, David
28 Mendez, Frank St. Clair, Mike D'Antonio, Mike Rubino, Santa Clara County, and the State of

1 California (collectively, "Defendants"), through their respective undersigned counsel, hereby
2 stipulate as follows:

3 1. On December 19, 2007, the parties stipulated and the Court ordered that discovery
4 would close on Friday, February 29, 2008, and motions to compel would be filed by Tuesday,
5 March 11, 2008.

6 2. On January 29, 2008, Plaintiffs also served a Request for Production of
7 Documents to Defendant Glenn Albin requesting various documents, including citizen
8 complaints.

9 3. On February 11, 2008, Plaintiffs served a subpoena upon the San Jose Police
10 Department for various documents regarding Defendant Glenn Albin, including citizen
11 complaints.

12 4. On February 22, 2008, Defendant Frank St. Clair subpoenaed tape recordings of
13 Dwight Watson's phone conversations from the Santa Clara Department of Corrections. The
14 Santa Clara Department of Corrections produced responsive recordings to Plaintiffs on Tuesday,
15 March 4, 2008.

16 5. The parties now agree that Defendant Glenn Albin's deadline to respond to
17 Plaintiffs' requests, described in paragraphs 2 and 3, is extended to Monday, March 10, 2008.

18 6. The parties agree Plaintiffs's deadline to produce redacted versions of the tapes
19 responsive to the subpoena described in paragraph 4, and corresponding redacted transcripts with
20 a privilege log describing privileged and private information, is Friday, March 14, 2008.


21 7. The parties also agree to extend the deadline to bring motions to compel, pursuant
22 to the requests described in paragraphs 2, 3, and 4, to Friday, March 21, 2008.

23 8. The deposition of Defendant Glenn Albin began but did not conclude on Friday,
24 February 29, 2008. The parties agree that the deposition of Glenn Albin shall be continued on a
25 mutually agreeable date.

26 9. Good cause exists for this order, as explained in the accompanying declaration of
27 K.C. Allan Waldron.

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2 Dated: 3-10, 2008

SUNIL R. KULKARNI
K.C. ALLAN WALDRON
MORRISON & FOERSTER LLP

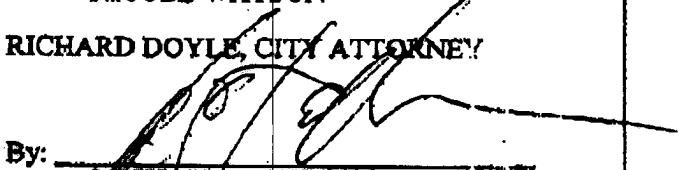
3
4
5 By: 
6 K.C. ALLAN WALDRON
7 Attorneys for Plaintiffs
8 DWIGHT WATSON, DANIEL
9 FARIAS, LAUREN WATSON, AND
10 NICOLE WATSON

11
12 Dated: 3-10, 2008

13
14 By: MARK MARTEL
15 MARK MARTEL
16 Attorney for Plaintiffs
17 DWIGHT WATSON, DANIEL
18 FARIAS, LAUREN WATSON, AND
19 NICOLE WATSON

20
21 Dated: 3/7, 2008

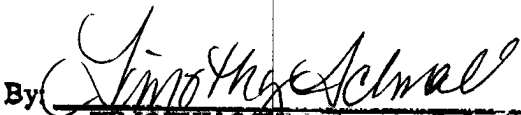
RICHARD DOYLE, CITY ATTORNEY

22
23 By: 
24 MICHAEL J. DODSON
25 Sr. Deputy City Attorney
26 Attorneys for Defendant
27 GLENN ALBIN

28
29 Dated: _____, 2008

30
31 By: _____
32 JENNIFER C. ADDAMS
33 Deputy Attorney General
34 Attorney for Defendant
35 MIKE RUBINO

36
37 Dated: _____, 2008

38
39 By: 
40 TIMOTHY SCHMAL
41 Attorney for Defendants
42 DAVID MENDEZ and
43 MIKE D'ANTONIO

STIPULATION EXTENDING DISCOVERY AND MOTION TO COMPEL DEADLINES

1
2 Dated: _____, 2008

SUNIL R. KULKARNI
K.C. ALLAN WALDRON
MORRISON & FOERSTER LLP

3
4
5 By: _____
6 K.C. ALLAN WALDRON
7 Attorneys for Plaintiffs
8 DWIGHT WATSON, DANIEL
9 FARIAS, LAUREN WATSON, AND
10 NICOLE WATSON

11
12 Dated: _____, 2008


13
14 By: _____
15 MARK MARTEL
16 Attorney for Plaintiffs
17 DWIGHT WATSON, DANIEL
18 FARIAS, LAUREN WATSON, AND
19 NICOLE WATSON

20 Dated: _____, 2008

RICHARD DOYLE, CITY ATTORNEY

21
22 By: _____
23 MICHAEL J. DODSON
24 Sr. Deputy City Attorney
25 Attorneys for Defendant
26 GLENN ALBIN

27 Dated: 3-7, 2008

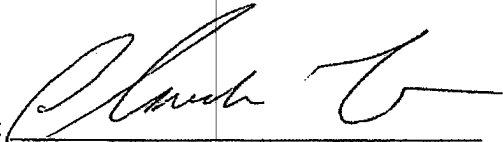
28 By: 
JENNIFER C. ADDAMS
Deputy Attorney General
Attorney for Defendant
MIKE RUBINO

Dated: _____, 2008

By: _____
TIMOTHY SCHMAL
Attorney for Defendants
DAVID MENDEZ and
MIKE D'ANTONIO

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Dated: 3-7-, 2008

By: 
CLAUDIA LEED
Attorney for Defendant
FRANK ST. CLAIR

Dated: _____, 2008

By: _____
MARK F. BERNAL
Deputy County Counsel
Attorney for Defendant
SANTA CLARA COUNTY

1 Dated: _____, 2008

2

3

By: _____

CLAUDIA REED
Attorney for Defendant
FRANK ST. CLAIR

4

5

Dated: 3/7, 2008

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7

By: _____

MARK F. BERNAL
Deputy County Counsel
Attorney for Defendant
SANTA CLARA COUNTY

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STIPULATION EXTENDING DISCOVERY AND MOTION TO COMPEL DEADLINES

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GENERAL ORDER 45 ATTESTATION

I, SUNIL R. KULKARNI, am the ECF User whose ID and password are being used to file the [PROPOSED] ORDER AND STIPULATION EXTENDING DEADLINES TO PRODUCE CERTAIN DISCOVERY AND FILE MOTIONS TO COMPEL RELATED TO CERTAIN DISCOVERY. In compliance with General Order 45, X.B., I hereby attest that all parties have concurred in this filing.

/s/ Sunil R. Kulkarni
Sunil R. Kulkarni

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 3/13/08

Ronald M. Whyte

Honorable J. xxxxxxxxxxxxxxxxxxxx Ronald M. Whyte

xxxxxxxxxxxxxxxx Judge

District